

EXHIBIT A

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

AT TACOMA

HP TUNERS, LLC, a Nevada limited liability company,)
Plaintiff,)
vs.) No. 3:17-cv-05760-BHS
KEVIN SYKES-BONNETT and SYKED ECU)
TUNING INCORPORATED, and JOHN)
MARTINSON,)
Defendants.)

VIDEOTAPED DEPOSITION OF JOHN H. MARTINSON, VOLUME 1

September 26, 2018

Seattle, Washington

Byers & Anderson, Inc.

Court Reporters/Video/Videoconferencing

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*Martinson, John
September 26, 2018*

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1 MR. WHITAKER: Object to the form.
2 THE WITNESS: I -- I believe I have.
3 Q (By Mr. Bleiman) What have you provided?
4 A The --
5 MR. WHITAKER: Object to the form.
6 THE WITNESS: The software e-mail
7 account has been -- that we both have access to -- has
8 been submitted.
9 Q (By Mr. Bleiman) What about -- is that your only e-mail
10 address?
11 A I have a personal e-mail address.
12 Q What -- what's that e-mail address?
13 A Johnsquared2@hotmail.com.
14 Q Johnsquared --
15 A The number 2 at hotmail.com.
16 Q 2 --
17 A At hotmail.com.
18 Q Have you provided your e-mails from the
19 johnsquared2@hotmail.com e-mail address in connection
20 with this litigation?
21 A I thought I did some, back a ways. But nothing recently.
22 Q Have you turned over all of your communications with Ken
23 Cannata in connection with this matter?
24 MR. WHITAKER: Object to the form.
25 THE WITNESS: I don't know if I've

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1 turned over all of them.

2 Q (By Mr. Bleiman) How would you ascertain if you have or
3 not?

4 A I'd have to go back and look.

5 Q All right. So we were talking about the buy/sell
6 agreement. There was also a share purchase agreement
7 where Bobbie Cannata purchased shares of Syked ECU
8 Tuning, correct?

9 MR. WHITAKER: Object to the form.

10 THE WITNESS: Yes.

11 Q (By Mr. Bleiman) Do you have a fully executed copy of
12 the share purchase agreement?

13 A I'm not sure.

14 Q Would that be in the pile of documents that you have at
15 your house?

16 A Most likely.

17 Q Now -- so your office associated with Syked ECU Tuning is
18 at your house?

19 A Yes.

20 Q What is the address of that office?

21 A Of the house?

22 | o of the house.

23 A 1602 Point Fosdick F-O-S-D-I-C-K Drive Northwest, Gig
24 Harbor, G-I-G space Harbor, Washington 98335-7810.

25 Q Do you have a Syked ECU Tuning phone number there?

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1 A No.

2 Q Just your personal number?

3 A Correct.

4 Q And do you receive calls in connection with your business

5 for Syked at that number?

6 A I'd have to say yes.

7 Q What's that phone number?

8 A 253-905-9872.

9 Q Do you have the corporate bylaws at --

10 MR. WHITAKER: Object to the form.

11 Q (By Mr. Bleiman) -- at your office or your house?

12 MR. WHITAKER: Object to the form.

13 THE WITNESS: I believe so.

14 Q (By Mr. Bleiman) What other corporate documents do you

15 maintain either as the CFO or in connection with your

16 ownership of Syked ECU Tuning?

17 A I have, like, the federal EIN number, and the -- the IRS

18 documents, Washington State business license. I think we

19 got the reseller's permit as well.

20 Q What IRS documents do you have?

21 A We formed as an S Corp, and so, like, those

22 correspondence or whatnot are in that box.

23 Q Do you maintain financial statements of the company?

24 A Not formal ones.

25 Q Are they just on the Quicken program?